

# COHEN & GREEN

August 29, 2023

**BY ECF**

Hon. Ann M. Donnelly  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, 1214 South  
Brooklyn, New York 11201

**Re: Payamps v. City of New York, 22-cv-00563**

Dear Judge Donnelly:

This firm along with co-counsel represents the Plaintiff. On August 9<sup>th</sup>, Defendants served a Rule 68 Offer of Judgment, attached as Exhibit 1. On August 15<sup>th</sup>, Plaintiff accepted the Rule 68 by notifying defense counsel in writing as specified in the Rule 68.

Plaintiff respectfully requests that the Court issue an Order extending Plaintiff's counsels' time to make an application for attorney's fees from the current August 23<sup>rd</sup> deadline up to and including October 22, 2023 to allow the parties time to resolve the issue of fees without motion practice. Defendants consent to this request.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

\_\_\_\_\_  
Jessica Massimi

*Pronouns: She/Her*

**COHEN & GREEN P.L.L.C.**

*Attorneys for Plaintiff*

1639 Centre St., Suite 216

Ridgewood, New York 11385

cc:

All relevant parties by ECF.